

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TATIANA WESTBROOK, an individual;
JAMES WESTBROOK, an individual;
HALO BEAUTY PARTNERS, LLC, a
Nevada Limited Liability Company,

Plaintiffs,

v.

KATIE JOY PAULSON, an individual;
WITHOUT A CRYSTAL BALL, LLC, a
Minnesota Limited Liability Company; and
DOES 1 through 100, inclusive,

Defendants.

NO. 2:20-cv-01606 BJR

[PROPOSED] STIPULATED ORDER
STAYING DISCOVERY PENDING
RESOLUTION OF DEFENDANTS'
PERSONAL JURISDICTION
CHALLENGE

NOTED: January 5, 2021

WHEREAS, on December 2, 2020, Defendants moved to dismiss Plaintiffs' Complaint on several grounds, including a lack of personal jurisdiction over Defendants in this forum (Dkt. 17);

WHEREAS, Plaintiffs filed their opposition to that Motion on December 23, 2020;

WHEREAS, at the parties' Rule 26(f) conference on Friday, December 18, 2020, Defendants informed Plaintiffs of their desire to stay all discovery in this action, including initial disclosures, pending this Court's resolution of their challenge to personal jurisdiction; and

STIPULATED ORDER STAYING DISCOVERY PENDING
RESOLUTION OF DEFENDANTS' PERSONAL
JURISDICTION CHALLENGE - 1

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WHEREAS, Plaintiffs are amenable to such a stay, with the exception set forth below,
and on the terms set forth below.

NOW, THEREFORE, Plaintiffs and Defendants, by and through their respective
undersigned counsel, hereby stipulate to this Court's entry of the following Order:

ORDER

THIS MATTER COMES BEFORE THE Court upon the parties' Stipulation and
Proposed Order Staying Discovery. Based on the parties' Stipulation, and for good cause shown,
it is hereby **ORDERED** that:

1. Discovery in this matter, including initial disclosures pursuant Fed. R. Civ. P.
26(a), is stayed pending this Court's resolution of Defendants' motion challenging personal
jurisdiction (Dkt. 17), with the sole exception that nothing in this Stipulation and Order shall
prevent Plaintiffs from issuing subpoenas for Lori Ann Barnhart's social media and other
internet content as well as her communications with Defendants for the purpose of preserving
evidence that Plaintiffs believe may be lost in the absence of such subpoenas.

2. Defendants retain any rights they may otherwise have to object to any subpoena
described in paragraph 1 above, on any grounds other than that such subpoena violates this
Stipulation and Order.

3. In the event this Court determines it may exercise personal jurisdiction over
Defendants, this stay will be lifted automatically, without further order of this Court, and the
parties shall fulfill their obligations under Rule 26(a) within 14 days of this Court's entry of such
an order on Defendants' Motion.

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DATED this _____ day of January, 2021.

The Honorable Barbara J. Rothstein

Presented by:

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